

# **Exhibit A**

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**[PROPOSED] ORDER GRANTING URGENT MOTION FOR AN ORDER STRIKING  
PORTIONS OF THE SUR-REPLY OF THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD TO AMBAC ASSURANCE CORPORATION'S  
AND FINANCIAL GUARANTY INSURANCE COMPANY'S REPLY  
MEMORANDUM OF LAW IN SUPPORT OF THEIR MOTION  
CONCERNING APPLICATION OF THE AUTOMATIC STAY**

Upon consideration of the *Urgent Motion for an Order Striking Portions of the Sur-Reply of the Financial Oversight and Management Board to Ambac Assurance Corporation's and Financial Guaranty Insurance Company's Reply Memorandum of Law in Support of Their Motion Concerning Application of the Automatic Stay* filed by Ambac Assurance Corporation (the “Urgent Motion”); and it appearing that (i) the Court has jurisdiction over the Urgent Motion pursuant to

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

28 U.S.C. § 1331 and 48 U.S.C. § 2166(a); (ii) venue of this proceeding and the Urgent Motion is proper under 28 U.S.C. § 1391(b) and 48 U.S.C. § 2167(a); (iii) notice of the Urgent Motion was adequate and proper under the circumstances and that no further or other notice need be given; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Urgent Motion is GRANTED as set forth herein;
2. Points II-IV (Paragraphs 15-41) of the *Sur-Reply of the Financial Oversight and Management Board to Ambac Assurance Corporation and Financial Guaranty Insurance Company's Reply Memorandum of Law in Support of Their Motion Concerning Application of the Automatic Stay* (Docket Entry No. 8164 in Case No. 17-3283) are hereby stricken.
3. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

Dated: \_\_\_\_\_

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LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE